

HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ANIMAL LEGAL DEFENSE FUND,

Plaintiff,

v.

OLYMPIC GAME FARM, INC. ROBERT  
BEEBE, JAMES BEEBE, and KENNETH  
BEEBE,

Defendants.

No. 3:22-cv-05774-RSL

DECLARATION OF CAROLYN LONG

LONG DECLARATION - 1  
No. 3:18-CV-06025-RSL

SMITH & LOWNEY, P.L.L.C.  
2317 EAST JOHN STREET  
SEATTLE, WASHINGTON 98112  
(206) 860-2883

1 I, CAROLYN LONG, declare that if called as a witness I would competently testify of  
2 my own personal knowledge, as follows:

3 1. I recently moved to Port Angeles, Washington as of January 2020 after having  
4 purchased a summer home there 15 years ago. I have visited Olympic Game Farm (OGF) five  
5 times over the years, from 2006-2017. I cannot remember the exact dates of my visits in the early  
6 2000s, but I remember the dates from my more recent visits to OGF.

8 2. In 2017, my husband and I started a nonprofit called Trees for Tigers USA, which  
9 funds habitat enrichment projects such as pools, platforms, trees, toys, etc. for exotic and wild  
10 animals in sanctuaries to improve the lives of captive wild animals. These structures/projects  
11 enable the animals to exercise species-typical behavior in an environment that allows them to  
12 have some control of their surroundings, even though they are in captivity. I was motivated to  
13 start a nonprofit to help captive wild animals, because although I always believed in animal  
14 welfare, my interests morphed over the years to the point where I wanted to make a difference. I  
15 want to help support the special needs of animals held in captivity, and I believe supporting  
16 sanctuaries is the best way to do that. Trees for Tigers USA has provided funding for all different  
17 types of animals, from tigers to marmosets to bears.

20 3. I've visited animal sanctuaries around the country and believe in supporting those  
21 that provide large habitats for animals and that allow their animals to live as normal of lives as  
22 possible. I love animals and enjoy seeing animals that are well taken care of in captivity, and  
23 many sanctuaries have allowed me that opportunity.

25 4. I've been a member of the Animal Legal Defense Fund (ALDF) continuously  
26 since at least December 18, 2018. I appreciate ALDF's efforts to help animals held in captivity,  
27 especially at roadside zoos.

29 LONG DECLARATION - 2  
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1           5.     Twenty years ago, I lived in Washington for 10 years and would take my  
2 grandson to OGF because it was an activity we could do together. The more I went, the worse I  
3 started to feel about OGF because I became more aware of how the animals are confined, the  
4 way some of the animals are fed, and how the animals are always listless when I see them.

5  
6           6.     One of the first OGF visits that stands out in my mind is when I went in the  
7 summer of 2007 because I went with my husband Tom and his friend. Both my husband and his  
8 friend are doctors, and we had a long discussion about the spread of communicable diseases,  
9 both from humans to animals and from animals to humans, because yak, bison, elk, and deer  
10 would stick their heads in our car and other cars during the OGF driving tour. The animals were  
11 searching for food because people can feed the animals bread. It seemed like an inappropriate  
12 food for the animals, and it made me sad to see them beg.

13  
14           7.     I also remember during that trip that several animals were lying down in the  
15 middle of the road and wouldn't move. The animals didn't even move as our car inched closer,  
16 and my husband actually had to drive around a yak to continue the driving tour. I remember  
17 thinking that this was extremely dangerous for the animals. It even appeared that some animals  
18 could have been dead in the middle of the road. Thinking about how some of these animals  
19 could be sick or dead was extremely upsetting to me.

20  
21           8.     Whenever I visited OGF with my grandson and husband, none of us ever wanted  
22 to visit the animals in the center enclosures. As one leaves the circle tour, a turn to the left can  
23 be made to visit the animals in wire cages in the center of the farm. Seeing the chain-link fencing  
24 from a distance, you can see they were small habitats in a row of cages with only chain link as  
25 dividers between the cages. Even from far away, the chain-link cages looked barren and  
26 depressing with nothing of interest in the cages. It was a very depressing sight from a distance,

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29 LONG DECLARATION - 3  
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1 and I was afraid of what I would see if we drove over there—sad animals in horrible conditions.  
2 The animals there—including tigers and lions—are housed in tiny enclosures and visible only  
3 through chain-link fencing. Such a sight is neither suitable for children, like my grandson, or  
4 adults, like me and my husband. That's why we always exited OGF before driving through to see  
5 the animals in the center enclosures.  
6

7 9. In 2017, I saw a petition on Change.org about improving the conditions of the  
8 animals at OGF. This petition really spoke to me, because I saw that other people had concerns  
9 about the welfare of the animals at OGF, too. After seeing the petition, I contacted the petition  
10 organizer and offered to video the animals in their cages, as we were going to be in Port Angeles  
11 for the summer. On August 30, 2017, my husband and I visited OGF and videoed the center area  
12 with the wire-fenced cages and center section. I did this to help the petition organizer to update  
13 everyone who follows the Change.org petition.  
14

15 10. My visit to OGF in 2017 was the first time I saw the animals in the center  
16 enclosures. There I saw wolves, tigers, lions, an arctic fox, a bobcat, and a lynx. The conditions  
17 of these animals were absolutely horrendous. There was really nowhere for these animals to get  
18 away from public view. The animals had dilapidated den boxes made of wood and concrete that  
19 didn't provide much shelter. For instance, one tiger's den box couldn't even fit the length of his  
20 body, so he couldn't fully lie flat inside. The dens provided the only shade from the sun for the  
21 animals. The dilapidated bunker-style dens were open on one entire side – the side facing the  
22 road where the cars stop only 3-5 feet from the dens to stare at the animals. The cars have their  
23 exhaust going all day every day so close to the animal in its open-sided den.  
24  
25  
26

27 11. On top of the small animal enclosures, I recall hardly seeing any enrichment for  
28 the animals. For instance, in a tiger enclosure, there was a child-size plastic blue swimming pool  
29

1 that was flipped over so that it couldn't hold any water. The wolves did not have any visible  
2 enrichment. I saw the white wolves fighting each other, which was probably because they had  
3 nothing else to do. I remember comparing the animal enclosures at OGF with the enclosures I  
4 saw at animal sanctuaries I previously visited, and the differences were day-and-night. It is clear  
5 how substandard the animal enclosures are at OGF. There is no way for the OGF animals to  
6 behave in a species-typical way because there are no enrichment toys or structures that could  
7 allow them to do so.

9 12. Similar to the enclosure holding the wolves, the lion I saw also had a barren and  
10 dilapidated enclosure. The bobcat, arctic fox, and lynx I saw were also housed in the same poor  
11 conditions, without any enrichment. It was all so horrible to see. While videoing the male lion,  
12 two male workers drove up to the front of the cage in a golf cart-type vehicle. They were  
13 laughing and joking with each other, got out of the vehicle for a few seconds and left without  
14 even addressing the lion by name, calling out to him or even acknowledging that he was even  
15 there. This indicates to me that OGF doesn't care about their animals. All the other sanctuaries  
16 that we help talk to their animals and spend as much time as possible interacting with them.

19 13. The conditions of the tigers really distressed me the most. There was a tiger lying  
20 on his side in his tight den box and he did not look well. On his enclosure was a sign that said  
21 "Animal is under veterinarian care," which confirmed to me that the tiger was really sick. I was  
22 so shocked that OGF would leave a tiger sick, alone, and on public display, with a lot of cars and  
23 people passing by daily. I still cannot get over the image of this sick tiger displayed in such a  
24 manner, and I cannot believe that OGF wouldn't move him to a private area away from the  
25 public so a veterinarian could actually "care" for him, like the sign suggested was happening.

1           14. I was so concerned about this tiger that I ended up calling OGF days later to ask  
2 about him. I spoke with a woman who said that the tiger was named Amadeus and that he was 20  
3 years old and experiencing kidney failure. She also told me that I should not be concerned about  
4 him being displayed because he had regular vet supervision. It makes me wonder if so many  
5 people complained or inquired over the health of Amadeus that OGF simply thought that the  
6 problem could be taken care of by hanging a sign over him that says "under veterinarian care."

8           15. I later found out through contact with Carolita McGee, the author of the  
9 Change.org petition about OGF, that Amadeus died a few months after I saw him on display. It  
10 upsets me to know that Amadeus spent the last days of his life on public display when he was  
11 surely suffering.

13           16. Also, during my 2017 visit, I remember seeing a European brown bear pacing  
14 back and forth with his tongue hanging out. It was a hot and sunny day, and there was no shade  
15 for any of the brown bears I saw. I also didn't see any water in the bear habitat—no drinking  
16 water and no pool. On top of that, I remember seeing how much bread all the bears ate, and it is  
17 clearly the staple in their diet. I can't imagine how OGF keeps track of their daily bread intake,  
18 seeing as how patrons can buy the bread all day, every month of every year. I took the time to  
19 look up the USDA inspection reports for OGF, and I saw in 2014 that the USDA advised OGF to  
20 stop feeding the animals bread as their staple diet. Clearly, OGF has not taken this advice.

23           17. On the way out of OGF during my last visit, my husband and I went into the gift  
24 shop so I could find an employee and speak with them about how upset I was by the horrible  
25 conditions of the animals. When I started speaking with a woman employee about this, she  
26 literally turned and walked away from me before I could even finish what I was saying.

1           18. Both my husband and I were extremely distressed by what we saw at OGF, so we  
2 decided to call Clallam County Commissioner Mark Ozias about our concerns after our 2017  
3 visit. When we talked to him on the phone, he agreed with us about the conditions and noted that  
4 he did not take his family to OGF. He also said he didn't think there was anything in his power  
5 he could do about the conditions at OGF. Mr. Ozias later followed up our call by emailing my  
6 husband with the contact information of a USDA employee we should speak to about our  
7 complaints.  
8

9           19. I intentionally have not visited OGF since 2017 because it is so depressing.  
10 Although I haven't visited in years, I have still done everything I could think of to help those  
11 animals. For instance, because OGF relies heavily on the Disney name in its brochure and  
12 "movie set tours," I emailed Disney in May 2018 letting them know that OGF, a for-profit  
13 corporation, was using the Disney name and exhibiting animals in substandard conditions. I told  
14 Disney about my many concerns for the welfare of the animals at OGF, but I never heard back.  
15

16           20. I've also had many conversations with Carolita McGee, the Change.org petition  
17 writer, about what we can do to help the OGF animals. We've exchanged information and tried  
18 our best to reach out to the people or organizations we thought could help.  
19

20           21. When my husband and I spend our summers in Washington, we always see ads  
21 for OGF. The ads remind me of the sad conditions for the animals and make me depressed, and I  
22 can't rest after I've seen them. For instance, in 2019, I went to the movies to see the Lion King,  
23 and my husband and I saw a movie preview ad for OGF. The ad was very clear about what kind  
24 of experience OGF wants people to have—it showed animals sticking their heads all the way  
25 into rolled down windows so patrons could feed and have hands-on interaction. This made me  
26 think about the day I, my husband, and his friend visited OGF and had a conversation about the  
27  
28



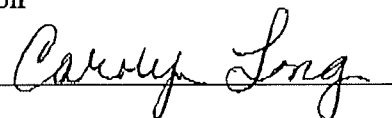
1 spread of communicable diseases to animals. It also made me think about how the animals are  
2 still suffering in the same conditions I saw them in when I first visited OGF almost 20 years ago.

3 22. To this day, I still make a record of anything I see related to OGF in order to do  
4 anything I can to help these animals.

5 23. If the Court grants ALDF the relief it seeks, my depression and concern over the  
6 animals—especially the tigers, lynx, lions, hoofed animals, bears, and wolves—would go away  
7 and my harms would be redressed. I would be able to happily visit OGF and see the living  
8 conditions of the animals improved. I would also be happy seeing the animals no longer eat  
9 bread but species-appropriate foods, far away from cars and roadways. I would no longer feel  
10 sad thinking about the animals and their sad enclosures lacking in water, shade, and enrichment.  
11 If I ever see any advertisements for OGF when I'm in Washington, I would no longer worry and  
12 fret about whether the animals at OGF are suffering. If the animals were instead moved from  
13 OGF and placed in a qualified sanctuary, I would plan a trip to visit the animals so I could see  
14 them thriving in larger habitats with enrichment-filled enclosures.  
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19 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
20 correct.  
21

22 Executed this 23<sup>rd</sup> day of March 2021, in Los Angeles, Washington  
23

24 

25 Carolyn Long  
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28